

US DISTRICT COURT  
DISTRICT COURT OF MASSACHUSETTS

STATE COURT DOCKET NO: ES17D2776  
STATE COURT: ESSEX PROBATE AND FAMILY COURT

RAYON WILLIAMS  
Plaintiff  
v.  
SABRINA WILLIAMS  
Defendant  
DATED: 12-20-2023

NOTICE OF REMOVAL:  
THE DEFENDANT PROVIDES NOTICE OF REMOVAL OF  
THE COMPLAINT FOR MODIFICATION FOR SEPARATION AGREEMENT  
AND 2-99 STANDING ORDER (PURSUANT RULE 60B6 FILED 12/20/23) FOR JUDGEMENT/ORDER DATED  
ON  
MARCH 20,2019 BY JUDGE THERESA BISENIUS TO BE REMOVED  
TO US FEDERAL COURT OF THE DISTRICT OF MASSACHUSETTS

**AFFIDAVIT**

THE DEFENDANT IN THIS MATTER, SABRINA WILLIAMS, ASSERTS THAT (1) THE PLAINTIFF,  
RAYON WILLIAMS, AND HIS ATTORNEY, M. MIMNO, ESQ, HAVE VIOLATED MASSACHUSETTS  
GENERAL LAW (MGL) CHAPTER 208 SECTION 1/1A/1B DUE TO NONCOMPLIANCE TO THE  
REQUIREMENTS  
AS SET FORTH WITHIN THESE LAWS. THE DEFENDANT ALSO ASSERTS THAT (2) THE PLAINTIFF  
AND HIS ATTORNEY DEMONSTRATED FRAUD AND THEFT PURSUANT TITLE 18 USC CHAPTER 47  
AND TITLE 18 USC CHAPTER 31.

THE DEFENDANT FURTHER ASSERTS THAT M. MIMNO, ESQ HAS DEMONSTRATED MISCONDUCT  
PURSUANT ABA RULES OF PROFESSIONAL CONDUCT FOR ATTORNEYS RULE 8.4 BY VIOLATING  
PROFESSIONAL CONDUCT FOR ATTORNEYS RULE 4.3.

THUS AS A RESULT OF THE PLAINTIFF'S VIOLATIONS OF RULES/LAWS/PROVISIONS/ETC.,  
THE DEFENDANT'S US CONSTITUTIONAL RIGHTS HAVE BEEN VIOLATED BY THE PLAINTIFF.  
IN ADDITION, THE ESSEX PROBATE AND FAMILY COURT, SUPERIOR COURT, APPEALS COURT, ETC.,  
HAVE FOLLOWED THE PLAINTIFF AND VIOLATED THE DEFENDANT'S CONSTITUTIONAL RIGHTS.

THE DEFENDANT PROVIDES EVIDENCE THAT SUPPORT THESE ASSERTIONS OF CONSTITUTIONAL  
RIGHTS HAVING BEEN VIOLATED BY THE PLAINTIFF. THE DEFENDANT NOW REMOVES  
DOCKET ES17D2776, SPECIFICALLY ADDRESSING THE COMPLAINT FOR MODIFICATION OF  
SEPARATION AGREEMENT AND THE 2-99 STANDING ORDER RULE 60B6 FILED 12/14/2023  
TO THE US DISTRICT COURT (FEDERAL COURT) UNDER THE CONSTITUTIONAL RIGHTS QUESTION  
JURISDICTION.

**BASIS FOR JURISDICTION:**  
THE BASIS FOR FEDERAL COURT JURISDICTION IS THE FEDERAL QUESTION.

THE SPECIFIC FEDERAL STATUTES OF THE UNITED STATES CONSTITUTION THAT ARE AT ISSUE IN THIS CASE INCLUDE:

TITLE 18 USC CHAPTER 47

TITLE 18 USC 31

UNITED STATES CONSTITUTION NINTH AMENDMENT

THE PLAINTIFF HAS DEMONSTRATED FRAUD AND THEFT AGAINST THE DEFENDANT. ALSO THE PLAINTIFF HAS HAD INFLUENCE

OVER THE OFFICIAL (JUDGE) OF THE STATE AND HAD CAUSED AND/OR INFLUENCED THE OFFICIAL TO VIOLATE THE

DEFENDANT'S US CONSTITUTIONAL RIGHTS, NAMELY THE DEFENDANT'S NINTH AMENDMENT CONSTITUTIONAL RIGHT.

THUS, THE VIOLATIONS OF THE DEFENDANT'S RIGHTS THROUGH THE PLAINTIFF'S FRAUD AND THEFT OCCURRED WITHIN THE

ESSEX PROBATE AND FAMILY COURT. THE FRAUD AND CHEAT OCCURRED SINCE THE PLAINTIFF AND DEFENDANT WERE

MARRIED IN 2011. HOWEVER, THE FRAUD AND THEFT BEGAN TO INVOLVE THE ESSEX PROBATE AND FAMILY COURT IN

DECEMBER OF 2017. THE PLAINTIFF HAD VIOLATED STATE LAW MASSACHUSETTS GENERAL LAW CHAPTER 208 SECTION 1/1A/1B,

WHICH WAS ALLOWED BY THE STATE COURT, WHICH CONTINUED TO VIOLATE THE DEFENDANT'S US CONSTITUTIONAL RIGHTS,

NAMELY HER NINTH AMENDMENT RIGHT. THEN THE PLAINTIFF INFLUENCED THE STATE COURT OFFICIAL TO VIOLATE THE

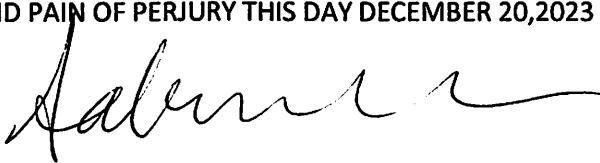
US CONSTITUTIONAL RIGHT OF THE DEFENDANT AS WELL REQUIRING THAT THE DEFENDANT FILE SUIT AGAINST

THE OFFICIAL IN STATE COURT. HOWEVER, VIOLATION BY THE PLAINTIFF AND THE STATE OFFICAL OF THE

DEFENDANT'S US CONSITUTIONAL RIGHT CONTINUES TO THIS DAY.

SIGNED UNDER THE PENALTIES AND PAIN OF PERJURY THIS DAY DECEMBER 20,2023

SABRINA WILLIAMS  
200 BROOKSIDE DRIVE UNIT C  
ANDOVER, MA 01810  
CERTIFICATE OF SERVICE



I HEREBY CERTIFY THAT I HAVE DELIVERED A COPY OF THIS DOCUMENT TO THE PLAINTIFF VIA THE ESSEX (LAWRENCE) PROBATE AND FAMILY COURT (PFC) CLERK'S OFFICE VIA MASS CIVIL PROCEDURE RULE 5 AS THE PLAINTIFF'S ADDRESS IS UNKNOWN DUE TO IMPOUNDMENT.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS DAY  
DECEMBER 20,2023.

SABRINA WILLIAMS  
200 BROOKSIDE DRIVE UNIT C  
ANDOVER, MA 01810

